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Attorneys for Defendant
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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LUANN P. GOULD,	:	
	:	05 CV 11118 (PBS)
Plaintiff,	:	
	:	
— against —	:	(ECF FILING)
	:	
LUCENT TECHNOLOGIES, INC.,	:	
	:	
Defendant.	:	
	:	
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DEFENDANT'S MOTION TO
MODIFY THE SCHEDULING ORDER

The defendant, through the undersigned counsel, moves to modify the current Scheduling Order in the following manner. Specifically, defendant is seeking a thirty (60) day extension of time to complete factual discovery, which currently closes on November 21, 2005.

This extension of time is being requested because the parties are actively engaged in mediation at this time and do not want to incur additional legal fees in litigating this matter further if there is a strong likelihood of settlement. On October 6, 2005, the parties attempted to mediate before the Honorable Joyce London Alexander. Due to a conflict of interest, however, Magistrate Alexander had to recuse herself. The mediation has subsequently been referred to Magistrate Judge Robert B. Collings. We anticipate the mediation will occur within the next couple of weeks.

This is the first request for a modification of this time limitation, and this request does not affect any other deadlines provided in the scheduling order.

Plaintiff counsel, Linda Harvey, Esq. has consented to this request.

Plaintiff's counsel has been notified of our request.

EPSTEIN, BECKER & GREEN, PC

By: 

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Dated: November 4, 2005